ORIGINAL

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Policies and Rules	)	
Pertaining to	)	
the Equal Access Obligations	)	RM-8012
of Cellular Licensees	)	

MCI REPLY COMMENTS

MCI TELECOMMUNICATIONS CORPORATION

By: Larry A. Blosser
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2082

DATED: October 15, 1992

Table of Contents

Summary

As demonstrated in the initial comments of the numerous parties supporting MCI's petition, cellular equal access is needed to bring the benefits of interexchange competition and the diversity and quality of IXC services to cellular subscribers.

The principal beneficiaries of cellular equal access would be consumers and cellular operators. Today, "roaming" is far too cumbersome, and call delivery options are too limited. Cellular phone users would benefit directly if IXC-provided competitive services and service options were available everywhere, not just in limited areas. As cellular subscribers find the service easier to use and more valuable, they would increase their use of the service, generating a greater demand and more revenues for the operator.

Without cellular equal access, consumers cannot readily access their preferred IXCs for long distance calling. When cellular carriers -- rather than their subscribers -- select the IXC to handle cellular-originated calls, consumers are deprived of the benefits of choice, diversity of services, quality, and price that they are accustomed to receiving in the landline environment.

MCI is ready, willing and able to extend innovative and highly valuable services to its cellular customers, and it has taken the initial steps with MCI Momentum and its Cellular 800 trial. But MCI's ability to offer these services nationwide, and to reach its cellular customers wherever they roam, is needlessly hampered by

the crazy-quilt pattern of equal access and non-equal access cellular systems in existence today.

Although the systems and network intelligence needed to provide these valuable services are available today in MCI's network, the cellular industry appears to be striving toward a closed proprietary network solution to the "roaming problem." Even if that solution is implemented, and the cellular industry is able, with that closed system, to achieve its stated goal of allowing cellular subscribers to reach anyone, anytime, any place, MCI believes the public interest would be better served if customers were given the freedom to choose the services -- and the service provider -- they deem to be in their own best interest.

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

In the Matter of	)	
	)	
Policies and Rules	)	
Pertaining to	)	RM-8012
the Equal Access Obligations	)	
of Cellular Licensees	)	

MCI REPLY COMMENTS

MCI Telecommunications Corporation (MCI), by its undersigned attorneys, hereby submits its reply comments in the above-captioned proceeding. In its June 2, 1992, Petition for Rulemaking, MCI asked the FCC to initiate a rulemaking proceeding to apply uniform, nationwide policies and rules to the provision of interexchange equal access by cellular licensees.

MCI's request for the initiation of a cellular equal access rulemaking was unanimously supported by those interexchange carriers (IXCs) and state regulatory commissions submitting initial comments. Various cellular licensees and a number of local exchange carriers (LECs) with cellular interests also submitted comments, some opposing the institution of a rulemaking. Still others supported the initiation of a rulemaking, but expressed a position that it should include consideration of removing equal access obligations from all cellular service providers.

For the reasons set forth more fully below, MCI submits that its petition and the initial comments, taken as a whole, "disclose[ ] sufficient reasons in support of the action

requested to justify the initiation of a rulemaking proceeding," 47 CFR §1.407 (1991). Accordingly, MCI urges the Commission to promptly issue an appropriate notice of proposed rulemaking.

Discussion

A. The Benefits Of A Pro-Consumer, Pro-Competitive Cellular Equal Access Policy Are Sufficiently Clear To Warrant Prompt Initiation Of A Rulemaking Proceeding

As demonstrated in the initial comments of the numerous parties supporting MCI's petition, cellular equal access is needed to bring the benefits of interexchange competition and the diversity and quality of IXC services to cellular subscribers. Without cellular equal access, consumers cannot readily access their preferred IXCs for long distance calling. When cellular carriers -- rather than their subscribers -- select the IXC to handle cellular-originated calls, consumers are deprived of the benefits of choice, diversity of services, quality, and price that they are accustomed to receiving in the landline environment. A more detailed discussion of the rationale for the mandatory provision of cellular equal access appears in the next section (Section B) of these comments.

1. Equal Access Is Pro-Competitive

Where a cellular carrier does not provide equal access, competition among IXCs for the business of cellular customers on the merits of their respective service offerings does not exist. Several IXCs have noted that the non-equal-access policies nearly universal among non-Bell Operating Company (non-BOC) cellular

carriers not only deny competing IXCs equal access to their customers, and limit cellular subscribers' long distance options, but also run contrary to the pro-competitive history of the telecommunications industry and Commission regulation.

2. Wholesale Competition Is Not "Enough" Competition

Some commenters assert that competition among IXCs for the carriage of all of a cellular system's long distance traffic is enough competition. But, clearly, it is not. IXC competition at the wholesale level fails to address the fundamental issue, specifically, consumer choice. Such competition does not accommodate cellular customers' needs for service features that are not available when the cellular licensee selects a single long-distance provider for all of its subscribers. Individual cellular subscribers should be able to access the IXC of their choice with the same relative ease as they do as landline customers, and their options should not be constrained by the decisions of the cellular system licensee.[1/] Otherwise, the less-than-fully-competitive duopoly structure which the Commission has created in cellular[2/] will be unnecessarily

---

[1/] Those commenters who argue that cellular resellers provide additional choices for those subscribers dissatisfied with the service provided by a facilities-based cellular provider fail to confront the fact that a reseller cannot provide equal access unless the underlying provider does so.

[2/] Bundling of Cellular Customer Premises Equipment and Cellular Service, CC Docket No. 91-34, Report and Order, released June 10, 1992, at para. 7: "[T]he cellular service is not fully competitive." See also "Concerns About Competition in the Cellular Telephone Service Industry," United States General Accounting Office, GAO/RCED-92-220, July 1992, at 2: "While GAO

(continued...)

extended into the interexchange market, to the customers' detriment.

3. Because Cellular Equal Access Is Not Ubiquitous, MCI's Ability To Reach And Serve All Its Customers Is Being Unreasonably Inhibited

Today, a dual system exists in the cellular industry. The BOCs and their cellular subsidiaries and affiliates are required to provide equal access.[3/] Most other cellular licensees are not. The movement (or "roaming") of customers from systems that provide equal access to those that do not frustrates the ability of customers to reach the interexchange carrier of their choice and the competitive services offered by that IXC. For example, when the customer in its "home" equal access system dials "1" followed by a short sequence of digits, it may access an IXC-provided virtual private network service or information service, whereas the call will either be blocked or misrouted when the same sequence is dialed when the customer is "roaming." Thus, although some cellular companies have criticized the IXCs for not providing services customized for cellular customers, the fact is that the presence of equal access in some markets and its absence

---

[2/](...continued)
found no evidence of anticompetitive or collusive behavior in the course of its work, the two-carrier (duopoly) market system that the FCC created may provide only limited competition in cellular telephone markets."

[3/] United States v. Western Elec. Co., 552 F. Supp. 131 (1982), aff'd mem. sub nom. Maryland v. United States, 460 U.S. 1001 (1983). See also United States v. Western Elec. Co., 1990-2 Trade Cas. (CCH) para. 69,177 at 64,447 (D.D.C. Sept. 12, 1990); United States v. Western Elec. Co., 578 F. Supp. 643 (D.D.C. 1983).

in others presents a significant impediment to the development and nationwide offering of such customized services by IXCs.

4. If Ubiquitous Cellular Equal Access Were Available Today, MCI Could Provide Innovative And Highly Valuable Services To All Of Its Cellular Customers

Notwithstanding the lack of universal equal access, MCI is developing and, where possible, offering specialized services for cellular customers. MCI has begun offering an origination product, called "MCI Momentum," to its cellular customers served by equal access systems. MCI Momentum utilizes postalized rates, similar to those of cellular in that the rates are time sensitive, but distance insensitive. MCI is also in the process of developing services for cellular customers that meet the customers' needs for call completion to roamers and, eventually, the option of caller pay.[4/] Such services require ubiquity of equal access. When an MCI cellular customer roams into an area where equal access is not provided, MCI cannot provide these services. If equal access were available in all cellular markets, MCI could develop and offer, on a competitive basis, services that provide call completion to roamers, a caller pay option, and many others.

[4/] For example, MCI is currently conducting a cellular "800" service trial with an equal access cellular provider in the Washington/Baltimore market, Bell Atlantic Mobile Systems (BAMS). At the same time, BAMS is offering a service option ("ContactLine") that provides some similar service options. This highlights one of the key advantages of equal access: customers have access to a range of competitive service offerings and are not limited to the menu of services and options their local carrier chooses to provide.

5. Pro-Competitive And Pro-Consumer Measures Such As Equal Access Are Fully Consistent With Government Policy

Many opponents of cellular equal access assert that the additional regulation necessary to implement such a policy would be contrary to the regulatory reform efforts of the current administration. These parties ignore the fact that exceptions to broad deregulatory initiatives are routinely made for pro-competitive and pro-consumer measures, such as equal access. This is evidenced by the recent report of President's Council on Competitiveness which identifies "equal access," among other factors, as being responsible for increased consumer choice and lower rates in the post-Divestiture long distance market.[5/]

B. Equal Access Is Both Necessary And Appropriate To Make Cellular Service An Integral Part Of The Seamless, Integrated Nationwide Telecommunications Network

In telecommunications, equal access is essential to achieving sustained competition, and it is equally essential to realizing ubiquitous seamless service. The increasing fragmentation among the providers of local service, whether landline or wireless, makes equal access all the more important if the wide range of service offerings already available in the interexchange marketplace are to be made available to all users of the public switched network, consistent with the Commission's statutory mandate to make available "rapid, efficient, Nation-

---

[5/] "The Legacy of Regulatory Reform: Restoring America's Competitiveness," Report of The President's Council on Competitiveness, (Competitiveness Report) at 35.

wide and world-wide" communications services at reasonable charges.[6/]

The cellular industry, in attempting to create "seamless" service, has become a technology island, operating in its own world. But standards are currently being developed that can, with appropriate modifications, allow services to cross technology boundaries seamlessly, so that in an equal access environment, all cellular customers will enjoy the same access to services and features developed outside the cellular industry that landline equal access customers already enjoy. But, fundamental to this is equal access. Access must be provided for signalling and database queries by inter-exchange and local exchange carriers so that location and routing information stored on cellular system databases can be utilized to efficiently route calls and support various billing options.

Competition in telecommunications has proven to be a major economic benefit to the public and a boost to the nation's economy. While the old telephone structure has been trimmed, hundreds of new telecommunications companies have been created, with tens of thousands of new jobs in all segments of the industry. Today, the average American household pays approximately 40-45 percent less in long distance rates than it did in 1983, the last year before to the introduction of equal access to landline telephony.[7/] Equal access in the long

---

[6/] 47 U.S.C. Section 151.

[7/] Competitiveness Report, at 35.

distance market has saved billions of dollars for American consumers and businesses.

Cellular service is currently priced at a significant premium over wireline access, but nine million people have been willing to subscribe to cellular because they put a high value on the key feature that differentiates it from landline service, its mobility. Cellular, like the notebook computer, the portable radio, and the automobile, has been able to capitalize on those fundamentally human desires for personal freedom and mobility. But the weakness of the cellular industry is that, after a decade of existence, it does not yet offer, throughout the country, the full range of competitive services that the public takes for granted in landline telephony. These include being able to receive a phone call without having to pay for it, and being able to receive phone calls on any phone, from anyone who has that phone number, from whatever phone the caller may be using. A number of cellular carriers have conducted trials of some such services, and the cellular industry is currently evaluating various options for the delivery of others. But even if cellular-industry-specific, proprietary systems (such as closed proprietary networks interconnected via the IS-41 protocol) permitted the cellular industry to eventually achieve its stated goal of allowing cellular subscribers to reach anyone, anytime, any place, the public interest would be better served if customers were given the freedom to choose services provided

through a system of Open Network Interfaces (ONI).[8/]

Equal access is the vehicle by which true seamless service can be offered not only to cellular customers but to everyone. For everyone loses when the telecommunications system in this country cannot interconnect, complete a call, and bill it to the proper party. Without equal access the telephone system in the United States will become increasingly Balkanized and eventually threaten the smooth operation of even basic service.

Equal access is the means by which competition in all areas of telephony can continue to expand and benefit the public. Through equal access the benefits of the billions of dollars invested by local and long distance companies in intelligent network infrastructure can be extended to the wireless customer. The new era of competition in telecommunications features services based on the use of intelligent networks, computerized databases and very high speed signalling. Within a few years virtually all telecom services will be based on computer platforms accessed through signalling systems. Virtually all of the PCS features will come from highly sophisticated telecommunications computer platforms.

The growth of these new services has been phenomenal and directly results from the explosion of need for near instant access to people and information in today's world. But this growth has occurred in landline telephony, not in wireless

---

[8/] The ONI model is presented and discussed in MCI's April 6, 1992 Reply Comments in the Commission's Intelligent Networks inquiry, CC Docket No. 91-346.

telephony. Neither MCI, nor any of the other interexchange carriers that have highly sophisticated intelligent networks can offer services, on a competitive basis, to all the customers of cellular systems without equal access.

The cellular industry has made among its highest priorities the enabling of "seamless" service and the option of caller pay. In cellular today, the cellular customer pays for both incoming and outgoing calls, and cellular carriers cannot send bills to people calling from other telephone systems. The result is that the percentage of incoming traffic is very low because cellular customers do not routinely give out their phone numbers. When they are away from their home systems, receiving any calls is extremely difficult and very expensive.

However, if equal access were available to all cellular customers, the local exchange and interexchange carriers, working with the cellular carriers, could solve the call completion and billing problems. Moreover, these problems could be solved with today's technology and today's numbering system, without the need to await the availability of additional number resources, projected for 1995. A graphic depiction of the capability that could be provided is attached.

The accompanying diagram illustrates one example of how any customer (of a local exchange carrier, of a cellular carrier, or of an interexchange carrier) could call any customer of any other carrier, and the call could be completed and billed according to the wishes of the called party. Landline callers expect to pay

for their calls except when the called party manifests its willingness to pay (typically through subscribing to an "800" service or by accepting a collect call). In cellular the called party (in a landline-to-cellular call) is responsible for airtime charges in the home system and, when roaming, must also pay the long distance charge for the forwarded portion of a call. However, if cellular calls were handled through an equal access system like that depicted in the accompanying diagram (which can be very easily done), calling to cellular phones can be the same as calling to landline phones. This architecture supports a much more efficient call completion system than is currently available or even planned in the cellular industry. Calls can be completed directly to the cellular customer, regardless of location, via the long distance carrier selected by the party responsible for payment of the toll charges. Unnecessary call forwarding and the attendant extra long distance charges are eliminated. Both caller pay and called party pay could be supported.

If equal access were available from all cellular companies, the chief beneficiaries would be the cellular companies and their customers. There seems little doubt that additional cellular call volume and, in particular, more inbound traffic would be generated.[2/] More people would carry cellular phones when traveling. Cellular customers would receive much better service. And the overall public interest of maintaining seamless telephone

---

[2/] MCI understands that the current outbound/inbound ratio for cellular is 85/15, whereas the corresponding ratio for landline telephone service is 50/50.

service in the United States would be well-served. The framework for healthy and vibrant competition in all areas of telecommunications in the 21st century would be in place.

C. The Legitimate Concerns Of Cellular Carriers Can Be Accommodated Through The Rulemaking Process, Just As Similar Concerns Were Handled When Equal Access Requirements Were Promulgated For Landline Carriers

The opponents of cellular equal access recite a litany of concerns strikingly similar to those voiced by LECs in the course of Commission proceedings nearly a decade ago in which interexchange equal access requirements were promulgated, first for the BOCs and later for GTE and the other independent telephone companies (ITCs). The Commission's experience in prescribing and implementing equal access in the landline environment demonstrates that it is well-equipped to handle an equal access rulemaking process for cellular.[10/]

Already, approximately half of the nation's cellular subscribers, those served by BOC-affiliated cellular systems, enjoy a form of equal access. Because the BOC-owned systems predominantly serve major urban areas, and because the Metropolitan Statistical Areas (MSAs) were (with a few exceptions) licensed several years before the rural areas, a logical place to begin the conversion to full equal access is the

---

[10/] The Commission, as well as other federal agencies, has recently been authorized by statute to use alternative dispute resolution techniques, including mediation and negotiated rulemakings. The Commission may find that these newly-authorized procedures can be employed to expedite the resolution of at least some of the issues surrounding cellular equal access.

MSAs.

In developing an equal access transition plan for the ITCs, the Commission considered all relevant factors related to the transition. However, some of the more difficult issues in the landline equal access transition will not arise in a cellular equal access rulemaking, and others will be substantially smaller in magnitude. This suggests that an equal access transition for cellular can be implemented with less difficulty than the implementation of ITC equal access.

First, the magnitude of the conversion task, whether measured by the number of carriers, the number of "exchanges" or the number of access lines, is far smaller in cellular than in the case of ITCs.[11/] Second, the switching systems (Mobile Telephone Switching Offices or MTSOs) commonly utilized by cellular carriers in both urban and rural markets are more likely to be equal-access-capable or equal-access-ready,[12/] so that it may be relatively easy to convert existing MTSOs to provide equal access via hardware or software upgrades.[13/]

[11/] Comments in this proceeding indicate that there are approximately 400 non-equal access cellular companies vs. 1200-1400 ITCs. The number of cellular switches (MTSOs) in service is similarly smaller than the number of local exchanges.

[12/] Equal access conversion in the landline environment was relatively slow because of the prevalence of older electro-mechanical switching equipment in smaller LEC exchanges. Because commercial cellular systems have been in existence for only ten years, equal-access-capable stored program control switches are commonplace.

[13/] This would include consideration of whether equal access capability can be added through software changes or through the

(continued...)

Therefore, once the Commission defines the scope of equal access obligations of cellular carriers and addresses (at least in broad terms) the issues related to equal access cost recovery, the primary remaining issue will be whether equal access conversion costs are sufficiently similar among various classes of carriers (MSA, non-MSA) that a single transition timeline should be established.

D. The Commission Should Refrain From Addressing Issues Related To Other Wireless Services In The Cellular Equal Access Rulemaking

The BOCs and others recommend that, if the Commission grants MCI's petition for rulemaking, the proceeding be expanded to address equal access not only for cellular service, but also for other wireless access services. The other wireless access services mentioned in various comments include paging, conventional mobile telephone services, specialized mobile radio service (SMR), enhanced SMR service (ESMR), and personal communications services (PCS). For the reasons set forth in this section, MCI recommends that the Commission promptly initiate a rulemaking addressing equal access issues related exclusively to cellular service. To the extent that the other wireless services named by some commenters raise equal access issues, those issues are most appropriately addressed in other proceedings.

[13/](...continued)
installation of circuit boards or other modular hardware upgrades to existing switches, as well as the feasibility of providing equal access via adjunct devices, host-remote configurations or other similar means where MTSO upgrades are not available.

Conventional Mobile Telephone Services. In most major urban areas and in an increasing number of rural areas, common carrier mobile telephone services, provided via a few frequencies allocated decades ago, have already been supplanted by the new generation of cellular services. MCI is not aware that there are any outstanding issues related to the failure or refusal of conventional mobile telephone service licensees to provide interexchange access on reasonable terms and conditions. In any event, the potential market for interstate toll services among conventional mobile telephone service subscribers appears to be small and rapidly shrinking. Should equal access or interconnection issues arise with respect to this limited service, the Commission can easily handle them on a case-by-case basis, as it has done in the past.

Paging. Because paging is (at least at present) exclusively a one-way inbound service, equal access rules for paging will be substantially different from those for cellular. Paging customers are entitled to an opportunity to obtain service from the IXC of their choice, but the procedures for implementing customer choice in an equal access paging environment are necessarily different from those in cellular. MCI believes that the full consideration of the particular ramifications of equal access in paging would best be accomplished through a separate proceeding, rather than in a portion of a rulemaking dealing primarily with cellular equal access issues.

SMR and ESMR services. MCI does not agree with those

commenters who recommend that equal access for SMR and ESMR systems be considered in the same rulemaking as cellular equal access. SMR service, as originally authorized by the Commission, typically utilized high-power facilities (or "base station"), separated by tens of miles, with no ability to hand off calls in progress. Although the FCC has authorized the provision of ESMR services (which utilize a cellular-like configuration with frequency reuse and handoff capabilities), MCI is not aware that ESMR service is as yet available on a commercial basis.

Although functionally similar to cellular, SMR service is not subject to common carrier regulation. In requiring LECs to implement equal access, the Commission relied principally upon its authority to regulate common carrier services. Assuming arguendo that equal access obligations should be imposed on SMR and ESMR services, MCI believes it would be preferable to do so in a separate proceeding, where all relevant factual and legal issues could be fully explored.

PCS. The Commission has recently proposed to allocate a portion of the spectrum for emerging technologies, including a broad class of services generically referred to as "personal communications services" or PCS. The allocation of three megahertz of spectrum in the 900 MHz band has been proposed for advanced paging services, including some with two-way messaging capability and other "narrowband" services. Other personal communications services, including (but not limited to) cellular-like Personal Communications Networks or PCN, may be accommodated

in spectrum between 1850 MHz and 1990 MHz.

The Commission's recent Notice of Proposed Rulemaking (NPRM) in the PCS rulemaking proceeding (Gen. Docket No. 90-314) seeks comment on a wide range of regulatory issues, including whether PCS should be licensed as private radio or a common carrier service, and whether PCS licensees should be afforded a "federally protected right to interconnect with the public switched network."[14/] In the portion of the NPRM dealing with interconnection issues, the Commission indicates that its definition of PCS sweeps so broadly as to include some services which may neither require nor desire interconnection with the PSTN and some other services which may depend largely or exclusively on interconnection to the PSTN for origination or termination of traffic. Given the broad scope of the issues raised in the PCS NPRM, MCI submits that it would be most efficient to consider all PCS-related interconnection and access issues in the generic PCS rulemaking proceeding rather than in the cellular equal access proceeding requested by MCI or in some omnibus "wireless equal access" rulemaking.

[14/] Nowhere in the PCS NPRM does the Commission expressly raise an equally significant issue which is the "flip side" of the PCS licensees' right to interconnect with the public switched network: whether, and if so, under what conditions, PCS licensees are obligated to interconnect with, or provide access to, other networks, including the PSTN. Notwithstanding this omission, MCI believes that this issue will be addressed in the upcoming round of comments and replies in the PCS rulemaking.

E. The Cellular Equal Access Rulemaking Should Include Consideration Of All Relevant Technical, Informational And Economic Factors

When the Commission issues a Notice of Proposed Rulemaking in response to MCI's petition, it should solicit comment on all issues related to equal access in the cellular environment. The issues to be addressed should include the following, which are important to MCI and the other IXC parties seeking cellular equal access:

1. marketing of IXC services to cellular subscribers;[15/]

2. equal access conversion issues (including transition timetables,[16/] procedures,[17/] and cost issues);[18/]

[15/] At a minimum, those IXCs participating in the equal access conversion process must be given reasonable and non-discriminatory access to cellular carriers' customer lists in order to market their services to the customers. Due consideration would be given to the proprietary nature of cellular carriers' customer lists, and appropriate non-disclosure agreements would be employed to ensure that customer information was used solely for the purpose of marketing IXC services and not disclosed to unauthorized parties. The Commission needs to address the issue of non-discriminatory availability of cellular customer lists and other customer information in the rulemaking, especially if cellular carriers' long distance affiliates or subsidiaries are to be listed on the equal access ballot.

[16/] See Section C, above, pp. 11- 13, for a discussion of transition timing issues.

[17/] The Commission should use the tested and proven wireline equal access conversion procedures -- customer lists, CARE formats, presubscription, balloting and allocation, etc. -- as the starting point, and make adjustments to these procedures to take into account the unique issues raised by the new cellular technology.

[18/] The Commission should address the related questions of which conversion-related costs cellular carriers may legitimately recover from either their subscribers or the IXCs, and the appropriate mechanisms for cost recovery (possibilities identified in the initial comments include one-time non-recurring

(continued...)

3. billing and collection issues (including fraud liability);[19]

4. IXC access to cellular data bases to permit IXCs to locate their customers (either in their home systems or when roaming) and to route calls to the appropriate destination;[20]

The Commission has already addressed and resolved most of these issues in the process of implementing equal access in the landline environment. While there are some issues that might require additional study or merit a different resolution in the cellular context, none appears to be inherently incapable of resolution.

---

[18](...continued)
charges, and the establishment of a system of cellular access charges).

[19] Billing issues include the following: (1) the need for a uniform identifier for cellular-originated long-distance calls (possibly by the addition of "information indicator" digits to the "automatic number identification" or ANI data transmitted with the call), so that IXCs can route and bill the calls appropriately; (2) the availability of cellular billing-name-and-address information and any related information needed by IXCs to bill their interexchange customers; (3) cellular carrier compliance with industry-standard formats for customer name and address, and call detail reports (both paper and electronic).

[20] In the cellular context, "destination" should be construed broadly, to include all call-routing and call-handling options available to the cellular customer via cellular, LEC or IXC networks. These would include routing of calls to other cellular and landline telephones; to fax machines, pagers or voice mail; and other call screening and call delivery options that may be designated in a "customer profile" maintained by the cellular carrier in a database and associated with the IXC's customer's cellular account or cellular instrument.

Conclusion

For the reasons set forth herein and in MCI's Petition for Rulemaking, MCI respectfully requests that the Commission promptly issue a Notice of Proposed Rulemaking for the purpose of adopting policies and rules for the implementation of cellular equal access.

Respectfully submitted,

MCI TELECOMMUNICATIONS CORPORATION

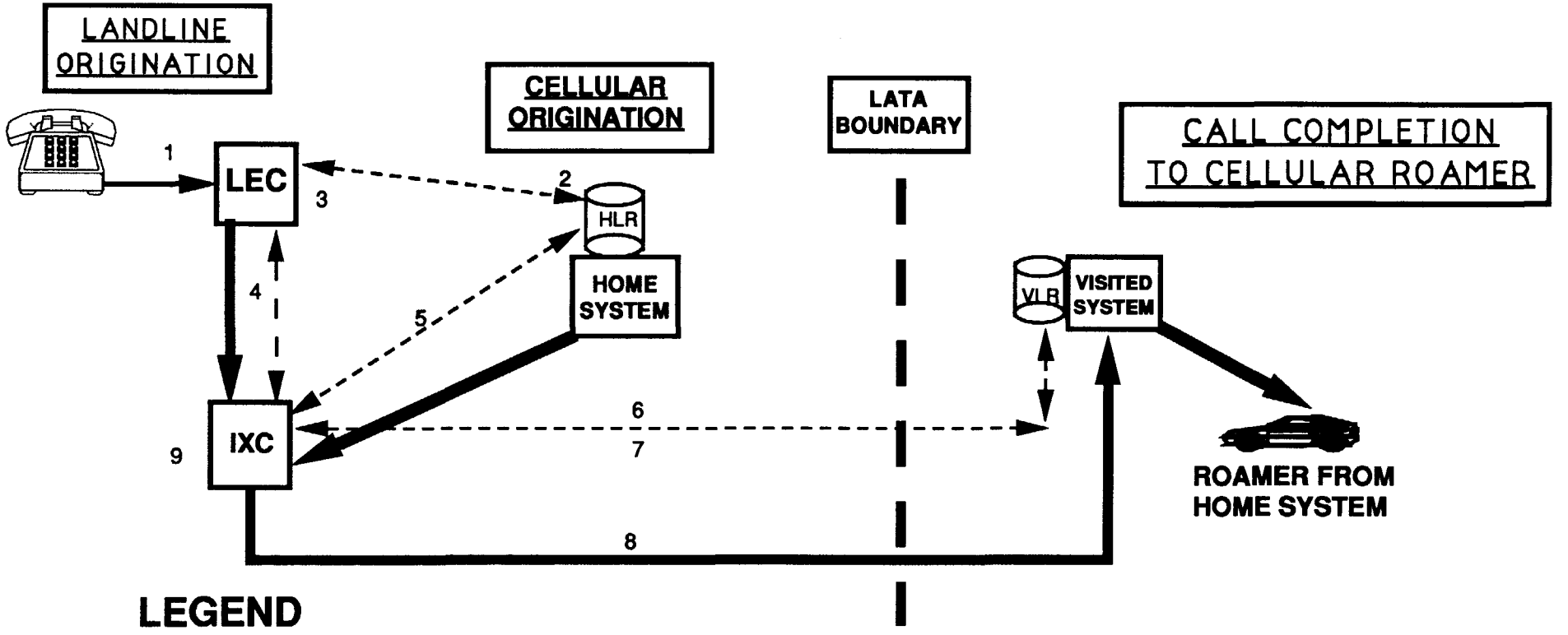
By: Larry A Blosser

Larry A. Blosser
Donald J. Elardo
1801 Pennsylvania Avenue, N.W.
Washington, D.C. 20006
(202) 887-2727

Its Attorneys

Dated: October 15, 1992

EQUAL ACCESS CALL COMPLETION TO CELLULAR ROAMER. EXAMPLE 1: CALL FROM LANDLINE PHONE.



LEGEND

1. LEC customer calls number that LEC detects as local cellular.
2. LEC sends IS-41 location and profile request to HLR.
3. HLR,updated by the visited system VLR, returns location to LEC.
4. LEC checks PIC of caller and sends call to IXC.
5. If LEC has not supplied location, IXC queries HLR for location.
6. IXC sends availability and routting request to VLR.
7. VLR returns availability and temporary number.
8. IXC routes call to visited system.
9. If caller pay has been invoked, and accepted by caller, IXC can bill caller for entire cost of call, including cellular airtime.

VOICE PATH ——————→

SIGNALLING PATH ←- - - - - - - →